

Rw/b
ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED MAY 26 2005 CLERK, U.S. DISTRICT COURT By <u>NT</u> Deputy

GW EQUITY LLC, GWBS, INC.
and GREAT WESTERN BUSINESS
SERVICES, LLC.

v.

PBS GLOBAL, INC. f/k/a PRUDENTIAL
BUSINESS SERVICES, INC., JOHN
PERSAUD, RICHARD MEIER, LAHNY
McCRAE, DALE GRANGER, JOSEPH C.
KISER, WAYNE LEE, WILLIAM JACOBS
and FRED RODDA

CAUSE NO.3-05CV0800-R

**UNOPPOSED MOTION TO ENLARGE TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS' VERIFIED ORIGINAL COMPLAINT AND
APPLICATION FOR INJUNCTIVE RELIEF, INCLUDING A TEMPORARY
RESTRAINING ORDER AND PLAINTIFFS' FIRST AMENDED COMPLAINT**

Defendants PBS Global, Inc. f/k/a Prudential Business Services, Inc., Bill Jacobs,
Dale Granger and Fred Rodda (collectively "Defendants") submit this unopposed motion
to enlarge time to answer or otherwise respond as follows:

I.

FACTUAL BACKGROUND

1. On April 22, 2005, GW Equity, LLC, GWBS, Inc. and Great Western Business
Services, LLC (collectively "Plaintiffs") filed their Verified Original Complaint and
Application for Injunctive Relief, Including a Temporary Restraining Order
("Complaint") asserting claims for breach of contract, breach of fiduciary duties, tortious

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interference, misappropriation, violation of the Texas Theft Liability Act, unfair competition, and violation of the Racketeer Influenced & Corrupt Organizations Act.

2. Defendants PBS Global, Inc. f/k/a Prudential Business Services, Inc., Dale Granger, Bill Jacobs and Fred Rodda were served sometime between May 8, 2005 and now. Before even serving all of the defendants with the first lawsuit, Plaintiffs filed an amended complaint on May 13, 2005.

3. Additional time is necessary to investigate the claims and allegations. The Complaint is vague as to the clients that the defendants allegedly solicited; thus, obtaining information from each defendant is crucial to the answer or other response. Because the defendants are each located in different states across the country (and because many of the defendants have not even been served), investigation of the claims is difficult and time-consuming.

II.

5. Defendants seek an extension until June 15, 2005 in order for all defendants to be served notice of the lawsuit and the amended complaint, to investigate the claims and allegations, and to answer or otherwise respond to the allegations in the Complaint.

III.

6. Plaintiffs do not oppose this motion and have agreed to an extension until June 15, 2005 for Defendants to file their answer or other response.

FOR THE FOREGOING REASONS, Defendants pray that their motion be granted and that the Court enter an order enlarging the time for Defendants to answer or

otherwise respond to the allegations in the Complaint and First Amended Complaint until June 15, 2005.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2005, a true and correct copy of this document was served on all plaintiffs by facsimile and certified mail, return receipt requested to plaintiff's counsel of record, McCreary & Stockford, L.P., 18333 Preston Road, Suite 150, Dallas, Texas 75252-5476.


Molly Steele

CERTIFICATE OF CONFERENCE

I hereby certify that on May 19, 2005, I conferred with counsel for plaintiffs, Cory Hartsfield of McCreary & Stockford, and he indicated he did not oppose the extension sought by defendants in this motion.


Molly Steele

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